

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

**HOUSING RIGHTS INITIATIVE; and
NEUHTAH OPIOTENNIONE**
on behalf of herself and all others similarly-situated

Plaintiffs,

v.

BOZZUTO MANAGEMENT COMPANY *et. al.*

Defendants.

Case No. 20-cv-1956

NOTICE OF SUPPLEMENTAL AUTHORITY

Plaintiff Neuhtah Opiotennione hereby provides the Court with the instant Notice of Supplemental Authority. On May 26, 2021, Judge Jason Park of the Superior Court of the District of Columbia issued the Order on Summary Judgment in the matter *Martin v. Apartment Investment and Management Company, et al.*, 2020 CA 000319 B, attached hereto as Exhibit 1.

The attached Order specifically addresses two issues in dispute in Defendants' Motion to Dismiss in this action. First, the Order holds unequivocally that the District of Columbia Consumer Protection Procedures Act (CPPA) applies to landlord-tenant relations and that a violation of the DCHRA gives rise to a DC CPPA claim. *See* Order at 15-17 (citing *District of Columbia v. Evolve, LLC*, 2020 D.C. Super. LEXIS 6, at *13-14 (D.C. Super. Ct. Feb. 25, 2020), *inter alia*). Second, the Order holds and makes clear that an individual seeking to lease an apartment is a consumer within the meaning of the CPPA. *Id.* at 17-18.

Plaintiff respectfully requests the Court consider this supplemental authority, which was decided after Plaintiff filed her opposition to Defendants' motion to dismiss the complaint.

Dated: June 11, 2021

Respectfully submitted,

/s/ Matthew K. Handley
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CERTIFICATE OF SERVICE

I hereby certify that on June 11, 2021, I filed the foregoing document with the Court's CM/ECF system, which will serve it on all counsel of record in this matter.

/s/ Matthew K. Handley

Matthew K. Handley